

Exhibit K

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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In Re Terrorist Attacks on September 11, 2001 : 03 MDL 1570 (GBD)(SN)
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**DECLARATION OF MARY C. WILLIAMS
CENTRAL INTELLIGENCE AGENCY**

I, Mary C. Williams, hereby state and declare as follows, pursuant to 28 U.S.C. § 1746:

1. I am employed by the Central Intelligence Agency (“CIA”) as the Litigation Information Review Officer (“LIRO”) for the Information Review and Release Division at the CIA, a position I have held since November 2023. As the LIRO, I am responsible for ensuring that any determinations as to the release or withholding of documents or information under my purview are proper and do not jeopardize the national security of the United States. I am also responsible for, among other things, the classification review of CIA documents and information that may be the subject of court proceedings.

2. Prior to serving as the LIRO, I served as the Acting Information Review Officer (“IRO”) for the Litigation Information Review Office for four months, performing the same duties I presently perform as the LIRO. Prior to that, I served as the Criminal and Civil Team (“CCT”) Lead in the Litigation Information Review Office for 45 months, where I was responsible for, among other things, reviewing CIA information that is subject to the Classified Information Procedures Act (“CIPA”) (18 U.S.C. App. 3 §§ 1-16) in connection with criminal proceedings. As CCT Lead, I was responsible for ensuring that any determinations to release Agency

information under my purview were proper and did not jeopardize the national security. Prior to becoming CCT Lead, I served as an Associate Information Review Officer for 19 months. In that role, I was responsible for conducting second-line reviews of Agency information subject to pending litigation, and making classification and release determinations regarding such information when necessary. Prior to that, I served as a Security Specialist with the United States Department of Justice (“DOJ”) for over 15 years.

3. Through the exercise of my official duties, I have become familiar with this litigation, *In re Terrorist Attacks on September 11, 2001*. I make the following statements based upon my personal knowledge and information made available to me in my official capacity. I was not personally involved in the creation of the records described in paragraph 6 of this declaration.

4. The CIA was served with a subpoena on or about June 6, 2018 (the “2018 subpoena”) in the above-captioned matter.

5. The CIA was served with a subpoena on October 19, 2021 (the “2021 subpoena”) in the above-captioned matter.

6. In response to the 2018 and 2021 subpoenas, the CIA produced to the parties in the above-captioned litigation the following records, among others:

- a.* CIA Directorate of Intelligence Report, Al-Qa’ida in Sudan, 1992-96: Old School Ties Lead Down Dangerous Paths, March 10, 2003 (CIA 38-52)
- b.* CIA Directorate of Intelligence Report, Identifying Al-Qa’ida’s Donors and Fundraisers: A Status Report, February 27, 2002 (CIA 193-199)
- c.* CIA Directorate of Intelligence Report, Terrorism Finance: Custodial Interviews Providing Leads Into Al-Qa’ida Financial Network, August 7, 2002 (CIA 306-315)
- d.* Usama Bin Ladin’s Finances: Some Estimates of Wealth, Income, and Expenditures,

November 17, 1998 (CIA 317-338)

e. CIA Directorate of Intelligence Report, Spectrum of Al-Qa'ida's Donors, October 30, 2003 (CIA 659-667)

f. CIA Directorate of Intelligence Report, Al-Rajhi Bank: Conduit for Extremist Finance, May 28, 2003 (CIA SUB_0001-6)

7. I am personally familiar with the CIA's policies and procedures regarding the creation and maintenance of documents and its record-keeping practices. The purpose of this declaration is to provide a certification of the documents described herein, in accordance with Rule 902(11) of the Federal Rules of Evidence.

8. The CIA's mission is to: (1) collect intelligence through human sources and by other appropriate means; (2) correlate and evaluate intelligence related to national security and provide appropriate dissemination of such intelligence; (3) provide overall direction for, and coordination of, the collection of national intelligence outside the United States through human sources and, in coordination with other elements of the United States Government, ensure that the most effective use is made of authorized collection resources while taking appropriate account of the risks to the United States and those involved in such collection; and (4) perform such other functions and duties related to intelligence affecting the national security as the President or the Director of National Intelligence may direct. *See* 50 U.S.C. §§ 3036(d)(1)-(4); Executive Order 12333 §§ 1.6-1.7.

9. The records described in paragraph 6 above were created and maintained as part of the regular activity of the CIA in carrying out its mission to collect, correlate, and evaluate intelligence.

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I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed this 18th day of July 2024.

A handwritten signature in black ink, appearing to read 'Mary C. Williams', is written over a horizontal line.

Mary C. Williams
Litigation Information Review Officer
Information Review and Release Division
Central Intelligence Agency